

Mr John Milne,
Deer Commission for Scotland
Great Glen House,
Leachkin Road,
Inverness IV3 8NW

Dear Sirs,

Response to Deer Commissions Consultation on the Strategy for Wild Deer Management in Scotland.

The Cairngorms Campaign is the only nationally based organisation with an exclusive focus on the Cairngorms. It has a membership drawn from all over the UK. Deer management is a topic of major significance within the Cairngorms. We therefore welcome this opportunity to comment on the Commission's draft strategy for the management of wild deer in Scotland. Our comments are influenced by the minister's announcement today of the government's intention to merge the Deer Commission into Scottish Natural Heritage since, given that agency's statutory commitments to the safeguarding of biodiversity, landscape and outdoor recreation, this strengthens the case for considering these broader aspects considered in the Deer Commission's consultative document.

The Campaign is a signatory to the Scottish Environment Link submission on the Deer Commission's strategy document. It supports all points made in that response, but below would add several points that it feels need further emphasis or exploration.

The Role of Wild Deer in the Wider Ecosystem

We strongly welcome the widening recognition of the importance of wild deer in the management of broader landuse issues such as biodiversity management and landscape. We feel however, that this aspect, and some of its implications, need clearer recognition and fuller exploration. In particular, there needs to be a clearer stated perspective that since red deer, over most of their current range, are the dominant large herbivore, management of them has multiple and very major effects in shaping the ecosystem and hence they should be perceived as a major "tool" for managing those ecosystems and associated ecosystem processes. As pointed out in the document, the extinction of major deer predators like wolves and lynx creates a need for people to manage deer populations. However, recent American studies, based on the absence or presence of the puma and/or wolf as predators, have shown how profound and diverse are the impacts of predators on how dominant herbivores shape an ecosystem including both aquatic and terrestrial habitats. Current human "predation" does not recreate many of these impacts.

Putting this aspect more fully in its current legal and ecological context, ecosystem based river catchment and basin management is increasingly important under the influence both of cutting edge thinking in environmental management and of the

Water Framework Directive and derived national legislation. This is briefly referred to in the strategy document in section 7.4.1. However, its implications through the interconnections with other factors mentioned in the consultative document (climate change, flood control, carbon fixation in soils) and the consequent desirable conditions of vegetation and soils and hence the implications for deer management are little explored.

An example in point is the loss of riverine forests over much of the current red deer range. There is abundant research evidence of the important relationships between riverine forests, bank stabilisation, general aquatic and terrestrial biodiversity, downstream flooding and enhancement of fish populations (and therefore salmon and trout fisheries). Current levels of grazing by red deer prevent the regeneration of such features. This kind of consideration is particularly relevant within a National Park as in the Cairngorms National Park!

Looking at impacts on soils from heavy grazing by red deer, some other issues also need considered. There are areas of steep slopes with parallel tracking caused by red deer leading to extensive vegetation damage, soil erosion and even slope slippage. While these areas are admittedly localised, they nonetheless occur widely - as in Glen Feshie, Glen Tilt, Glen Ey, and on Invercauld estate. Associated with these clearly visible impacts are more extensive but much less obvious impacts on soil compaction and associated increased runoff.

Another issue that arises when deer management is approached in this broader perspective is the attitude to the spreading practise of fencing off entire estates with deer fences and parallel electric fences and the killing of all deer within the large fenced areas. Previously, the Deer Commission has taken the stance that, as long as there were no welfare implications for the deer, the Commission had no further role in this. However, if biodiversity, carbon storage in soils and vegetation, and catchment management come within the Commission's focus, then consequent ecosystem impacts of the removal of the dominant herbivore over such large areas needs considered and the issue therefore needs revisited by the Commission. For example, changes in grazing patterns within such areas will definitely lead to changes in vegetation cover and hence in landscape.

Further, such fencing practises have major landscape impacts as intrusions on wild land and the consultation acknowledges the importance of wild land to many users of the area. They are also a constraint on broad access to the upland areas affected and the provision of gates at intervals of several kilometres does little to remove this constraint.

Impacts of the Management of Red Deer

Policies for the management of red deer in the public and private interest must also take into account the direct impacts of management practises and not simply those mediated through culling practises and grazing pressures etc. An issue that arises here is the spread, not only of bulldozed tracks into wild areas, but also of extensive tracking damage due to the use of various types of All Terrain Vehicles which is increasing both in frequency and range. The vehicles kill the vegetation along the drivelines exposing vulnerable soils. Damage to vegetation through this practise is increasingly extensive, sometimes with sets of parallel tracks of exposed soils and/or peat over several miles on some hills. In steeper slopes, the exposed soils have now eroded to form considerable lengths of ground 50 to several hundred metres long 11-12 metres wide and which are still expanding in breadth and length. This general problem needs attention.

The Range of Red Deer

Section 3, Vision, states that, “The red deer range appears to have remained relatively static recently.” The spread of red deer into the Scottish lowlands is potentially the most serious issue facing the Commission. In our experience, the red deer range is in fact expanding. They can be found for example within one mile of the classically lowland village of Alford and local people have in the past reported red deer hinds appearing in their gardens within the settlement in winter. The Commission emphasizes, in Section 7.4.3, the importance of basing its strategy and policy on sound science. The Commission therefore needs to base its policies in this area on more solid ground than the tentative statement above. It should therefore make a more careful on the ground assessment as to whether red deer range is expanding and assess any expansion quantitatively before setting this issue aside as a policy issue within the strategy

Asserted Economic Significance of Deer Management in Scotland

The extent of the economic importance of deer management in Scotland is a significant factor in assessing the right policies and strategy to pursue and the balance between private and public interests. The minister’s foreword asserts that wild deer are, “a key part of our environment and our rural economy.” Within the report, the chief supporting evidence for this statement lies in section 2.1 where it states that, “a survey carried out by the Association of Deer Management Groups in 2004 suggest that deer management in Scotland supports the equivalent of 2,520 jobs in Scotland.” Despite the tentative nature of the claim embodied in the use of the term “suggests” the next statement in the section treats this figure as reliable, stating the value to the Scottish economy “is estimated as £105 million annually.” At the next step, in Annex 1, section 1.4, this statement is treated as proven and reliable saying “Wild Deer are an important asset for Scotland’s economy as they support several thousand jobs --- etc.” Progressively, increased reliability is attributed to the claim!

The strategy commits itself to underpinning its policies and actions on sound science (section 7.4.3) and this must include sound social and economic science. The Association of Deer Management Groups is hardly a disinterested source of such data, an essential element of “sound science”, and economists who have examined the report in question find its economics questionable. Further, previous studies¹ assessing the bulk of the area where employment is created came to very much smaller figures. Has employment increased massively in recent years? It seems very unlikely! The ease with which the credibility of tentative figures is accepted and then progressively promoted, contrasts strongly with the caution with which assessment of deer populations are treated in the strategy document, based on the Commission’s own considerable data. Any such benefits to the economy must also be assessed against the costs of managing deer (EG the large costs incurred by the Forestry Commission in deer culling.)

The figures used on the scale of economic value of deer management should either be removed from the document or treated clearly with the caution their doubtful reliability justifies and other assessments or employment created etc given equal consideration.

Outdoor Recreation

Section 6.3 (d) states, “Responsible outdoor access will be encouraged through provision of accurate and up-to-date information on stalking activity and ----- etc” This

¹ EG The Red Deer Industry – Finance & Employment (1978/9) A survey report for the Scottish Landowners Federation by Elizabeth Jarvie.

policy implicitly refers to the alleged problem of disturbance of deer stalks by hillwalkers and ramblers. There are implications behind this policy that need examined. A first is the implied assertion that it is the recreationists alone who need provided with information. Is there not a need for a policy that also educates stalkers and shooting clients about these other recreationists? It is not hillwalkers alone that need educated!

A second is the implication that this conflict is so widespread it really needs considerable action. Staines was commissioned to assess this problem when on the staff of the then Institute of Terrestrial Ecology and his report revealed not only the difficulty of finding the problem but that 90% of disturbance of deer in the stalking season was caused by stalking. The remainder was a minor issue. Experience has demonstrated that what is disturbed by the presence of other recreationists is not so much deer stalking as the territorial sense of stalkers, stalking clients or landowners. This is not the simple issue the above statement implies.

We would be happy to discuss any of the points above.

Yours sincerely,

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